1 Angela Hooper, SBN 334269 LAW OFFICES OF ANGELA HOOPER 2 315 Wall Street, Suite 8 Chico, CA 95928 3 Telephone: (530) 680-4689 Email: ahooper116@gmail.com 4 5 Attorney for Plaintiff John Vance 6 Alan G. Crowley, SBN 203438 7 WEINBERG ROGER ROSENFELD, PC 8 1375 55th Street Emeryville, CA 94608 9 Telephone: (510) 337-1001 Facsimile: (510) 337-1023 10 Email: acrowley@unioncounsel.net 11 Attorney for Defendant 12 Construction & General Laborers' Local Union No. 185 13 UNITED STATES DISTRICT COURT 14 EASTERN DISTRICT OF CALIFORNIA 15 16 Case No. 2:21-CV-02048-KJM-DMC JOHN VANCE 17 STIPULATION AND ORDER TO Plaintiff. MODIFY SCHEDULING ORDER 18 v. 19 CONSTRUCTION & GENERAL LABORERS' 20 LOCAL UNION NO. 185 and DOES 1 through 20, inclusive 21 Defendants. 22 23 24 Plaintiff John Vance, by and through his counsel, Angela Hooper of the Law Offices of 25 Angela Hooper, and Defendants Construction & General Laborers' Local Union No. 185, by and 26 through their counsel Alan Crowley of Weinberg Roger Rosenfeld, a Professional Corporation, 27 collectively referred to as "the Parties," hereby request the deadlines for a coordinated settlement

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1	conference, for non-expert discovery completion, and for the notice of dispositive motions as set
2	forth in the Scheduling Order of March 21, 2022, (ECF No. 20), be extended by four months making
3	the new dates as follows:
4	1. The Parties shall coordinate a Settlement Conference with the Court by December 1, 2023;
5	2. Non-expert Discovery Cutoff shall be December 9, 2023;
6	3. Dispositive Motions shall be noticed by January 13, 2024.
7	WHEREAS, the Parties currently are scheduled to participate in a full day of mediation on
8	August 24, 2023.
9	WHEREAS, the Parties wish to engage in further discovery efforts and witness depositions
10	should the mediation present to be unsuccessful.
11	STIPULATION
12	NOW, THEREFORE, Plaintiff and Defendant, by and through their attorneys of record,
13	hereby stipulate and agree to the modification of the court March 21, 2022, Scheduling Order as
14	follows:
15	1. The Parties shall coordinate a Settlement Conference with the Court by December 1, 2023;
16	2. Non-expert Discovery Cutoff shall be December 9, 2023;
17	3. Dispositive Motions shall be noticed by January 13, 2024.
18	IT IS SO STIPULATED.
19	
20	Date: August 1, 2023 LAW OFFICES OF ANGELA HOOPER
21	_/s/ Angela Hooper
22	Angela Hooper Attorney for Plaintiff John Vance
23	Date: August 1, 2023 WEINBERG ROGER ROSENFELD, PC
24	Hambard Reserve Salar Reserve
25	_/s/Alan Crowley
26	Alan G. Crowley Attorneys for Defendant
27	Construction & General Laborers' Local Union 185
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-	STIPULATION AND ORDER TO MODIFY SCHEDULING
	ORDER

Case 2:21-cv-02048-KJM-DMC Document 22 Filed 08/07/23 Page 3 of 3 **ORDER** Good cause having been shown, the parties' above stipulated request for a modification of this Court's Scheduling Order of March 21, 2022, (ECF. No. 20) is HEREBY GRANTED. Accordingly, pursuant to the parties' stipulation, IT IS HEREBY ORDERED that the scheduling order is modified as follows: 1. The Parties shall coordinate a Settlement Conference with the Court by December 1, 2023; 2. Non-expert Discovery Cutoff shall be December 9, 2023; 3. Dispositive Motions shall be noticed by January 13, 2024. IT IS SO ORDERED. Dated: August 7, 2023 **COTA DENNIS** UNITED STATES MAGISTRATE JUDGE